

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE

NANCY PLUNK,)	
)	
Plaintiff,)	
)	Case No.: 1:23-CV-1058
v.)	
)	JURY DEMAND
SHELTER MUTUAL INSURANCE COMPANY,)	
JOHN PRICE,)	
VCE, INC., and JASON PIRTLE,)	
)	
Defendants.)	


ATTORNEYS' FEE AFFIDAVIT OF NATHAN B. PRIDE

I, Nathan B. Pride, being first duly sworn, upon my oath, state as follows:

1. I am over the age of eighteen (18) years of age, and I have personal knowledge of the relevant facts set forth herein. I have been a Tennessee-licensed attorney since 1981 (Board of Professional Responsibility # 9615). I practice in state and federal courts in Tennessee and am a former judge for the 26th Judicial District Circuit Court of Tennessee. My office is located in Jackson, Tennessee. My practice includes general civil litigation and insurance disputes.
2. I have consulted with undersigned counsel for VCE, Inc. regarding their hours spent and hourly rates for this matter. Per Local Rule § 54.1(b)(2) of the Western District of Tennessee, I offer this Affidavit in support of VCE, Inc.'s Motion for Award of Attorneys' Fees.

3. Recognizing the complexity of the present matter and based upon my forty-two (42) years of experience, the prevailing rate for attorneys in the Western District legal community with similar experience and for similar services is in the range of \$300-\$500 per hour.
4. Recognizing the complexity of the present matter and based upon my experience, the time spent by VCE, Inc.'s counsel in defense of the matter has been reasonable and necessary.
5. The hourly rates charged by VCE, Inc.'s counsel are within the range of prevailing rates for similar services in the legal community, including the Western District, and should be considered reasonable.
6. In summary, the fees sought hereunder are reasonable under the applicable criteria of Rule 1.5(a) of the Tennessee Rules of Professional Conduct.

FURTHER AFFIANT SAITH NOT.




NATHAN B. PRIDE

STATE OF TENNESSEE }

COUNTY OF Madison }

Personally appeared before me, a Notary Public of said County and State, **Nathan B. Pride**, with whom I am personally acquainted or proved to be on the basis of satisfactory evidence and who acknowledged that he executed the within instrument for the purposes therein contained. I attest under penalty of perjury that the information in this document is notarized by me, a Notary Public, and subscribed by the notary information listed below. Witness my hand and seal, subscribed and sworn before me this the 6 day of **November, 2023**.



NOTARY PUBLIC

My commission expires: 2/28/2027

